

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	MDL No. 2419 Master Dkt. 1:13-md-02419-FDS
THIS DOCUMENT RELATES TO: All actions.	

**NOTICE OF FILING OF AGREED ORDER REGARDING PLAINTIFFS' STEERING
COMMITTEE'S MOTION TO AMEND PREVIOUSLY FILED SHORT FORM
COMPLAINTS [Dkt. No. 1291]**

The Plaintiffs' Steering Committee ("PSC") hereby files the attached agreed order regarding the Plaintiff's Steering Committee's Motion to Amend Previously Filed Short Form Complaint (Dkt. No. 1291). On July 24, 2012, the PSC filed a Motion to Amend Previously Filed Short Form Complaints (Dkt. No. 1291, the "Motion to Amend") seeking amendment of certain short form complaints to add claims that have since ripened by the passage of time.

The PSC continued to meet and confer with defendants who requested the PSC undertake a census of affected short form complaints. Following that census, the PSC identified the short form complaints subject to the motion along with claims sought to be added. A review of those claims showed that the Motion to Amend applied only to claims arising under Count VI of the Master Complaint and naming Defendant Unifirst Corporation ("Unifirst").

Thereafter, counsel for the PSC and Unifirst met and conferred about the form of an agreed order. The parties have now reached an agreement and respectfully request that the Court enter the attached order related to the Motion to Amend.

Dated: September 5, 2014

Respectfully submitted,

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV
Benjamin A. Gastel
BRANSETTER, STRANCH & JENNINGS
PLLC
227 Second Avenue North
Nashville, TN 37201
Telephone: (615) 254-8801
Facsimile: (615) 255-5419
gerards@branstetterlaw.com
beng@branstetterlaw.com

*Plaintiffs' Steering Committee and Tennessee
State Chair*

Thomas M. Sobol
Kristen Johnson Parker
HAGENS BERMAN SOBOL SHAPIRO LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003
tom@hbsslaw.com
kristenjp@hbsslaw.com

Plaintiffs' Lead Counsel

Elizabeth J. Cabraser
Mark P. Chalos
Annika K. Martin
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
150 Fourth Avenue North, Suite 1650
Nashville, TN 37219-2417
Telephone: 615.313.9000
Facsimile: 615.313.9965
ecabraser@lchb.com
mchalos@lchb.com
akmartin@lchb.com

Federal/State Liaison

Marc E. Lipton
LIPTON LAW
18930 W. 10 Mile Road
Southfield, MI 48075
Telephone: (248) 557-1688
Facsimile: (248) 557-6344
marc@liptonlawcentercom

Kim Dougherty
JANET, JENNER & SUGGS, LLC
31 St. James Avenue, Suite 365
Boston, MA 02116
Telephone: (617) 933-1265
kdougherty@myadvocates.com

Patrick T. Fennell
CRANDALL & KATT
366 Elm Avenue, S.W.
Roanoke, VA 24016
Telephone: (540) 342-2000
pfennel@crandalllaw.com

Mark Zamora
ZAMORA FIRM
6 Concourse Way, 22nd Floor
Atlanta, GA 30328
Telephone: (404) 451-7781
Facsimile: (404) 506-9223
marc@markzamora.com

Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: September 5, 2014

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV